

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

No. 2:15-MD-02641-DGC

This Document Relates to:

ANDREA STITH

Civil Case No. 2:16-cv-01849-DGC

**PLAINTIFF'S MOTION FOR
WITHDRAWAL AND SUBSTITUTION OF COUNSEL**

COMES NOW, the Plaintiff herein, and files this, the Plaintiff's Motion for Withdrawal and Substitution of Counsel, and respectfully shows to this Court as follows:

The Plaintiff requests that the Nemeroff Law Firm be granted leave to withdraw as counsel in the main MDL No. 2641 and in member case *Stith*, 2:16-cv-01849.

The Plaintiff further requests attorney Robert J. Binstock of Reich & Binstock, LLP, 4265 San Felipe St., Suite 1000, Houston, TX 77027, be substituted as her attorney-of-record in the instant action.

The Nemeroff Law Firm has conferred with attorney Robert J. Binstock and represents to this Court that all above-mentioned counsel consent to this Motion.

WHEREFORE, the Plaintiff respectfully requests that the Nemeroff Law Firm be granted leave to withdraw as counsel in the main MDL No. 2641 and in member case *Stith*, 2:16-cv-01849, and that attorney Robert J. Binstock of Reich & Binstock, LLP be substituted therefor.

Dated: February 25, 2019

Respectfully submitted,

By: /s/ Robert J. Binstock

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CERTIFICATE OF SERVICE

I hereby certify that on February 25, 2019, a copy of the foregoing Plaintiff's Motion for Withdrawal and Substitution of Counsel was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties on the electronic filing receipt. Parties may access this filing through the Court's system.

/s/ Robert J. Binstock